

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK

MARTÍN JONATHAN BATALLA VIDAL,
ANTONIO ALARCÓN, ELIANA FERNANDEZ,
CARLOS VARGAS, CAROLINA FUNG FENG,
M.B.F., by her next friend LUCIA FELIZ,
XIMENA ZAMORA, SONIA MOLINA, and
JOHANA LARIOS SAINZ,

Case No. 1:16-cv-04756 (NGG)(JO)

October 2, 2020

On behalf of themselves and all other
similarly situated individuals

and MAKE THE ROAD NEW YORK,

On behalf of itself, its members, and its
clients,

Plaintiffs,

v.

CHAD WOLF, in his official capacity as the
purported Acting Secretary of Homeland Security,
et al.,

Defendants.

**SUPPLEMENTAL DECLARATION OF TRUDY S. REBERT
IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

I, Trudy S. Rebert, hereby declare:

1. Attached hereto as Exhibit N is a true and correct copy of a letter filed on behalf of plaintiffs in *Garcia v. United States*, 17-cv-05380-WHA (N.D. Cal.), and the plaintiffs in related cases in the Northern District of California, *Regents of the Univ. of Calif. v. U.S. Dep't of Homeland Sec.*, 17-cv-05211-WHA (N.D. Cal. Aug. 18, 2020), ECF 304, to request a status conference.

2. Attached hereto as Exhibit O are true and correct copies of a notice of dismissal without prejudice filed by the plaintiffs in *Perez Lazarte v. Wolf*, No. 20-cv-00894 (E.D. Va. Sept. 18, 2020), ECF No. 5, and the court's order granting plaintiffs' request for dismissal without prejudice issued on Sept. 22, 2020, ECF No. 6.

3. Several immigration attorneys who represent putative class members have contacted counsel for the *Batalla Vidal* Plaintiffs to inquire about this litigation and the proposed class definitions. Those immigration attorneys sought litigation updates and expressed relief that Plaintiffs filed a class action which seeks to protect their clients' interests by challenging Defendants' further attempts to dismantle DACA.

I, Trudy S. Rebert, declare under penalty of perjury, under 28 U.S.C. § 1746 and the laws of the United States of America, that the foregoing Declaration is true and correct.

Executed this 2nd day of October 2020 in Queens County, New York.

/s/ Trudy S. Rebert
Trudy S. Rebert, Esq. (TR 6959)

CERTIFICATE OF SERVICE

I hereby certify that on October 2, 2020, a true and correct copy of the foregoing Supplemental Declaration of Trudy S. Rebert in Support of Plaintiffs' Motion for Class Certification was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

/s/ Trudy S. Rebert
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